Methyallyloxyphenol (MOP) - Comments of Environmental Defense

(Submitted via Internet 7/9/02).

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Methyallyloxyphenol (MOP).

The test plan and robust summaries were prepared by FMC Corporation. Information presented in the test plan was quite abbreviated and certainly not adequate to justify that MOP is used solely as a closed system intermediate with no opportunity for human exposure. Therefore, we disagree with the conclusion that neither reproductive nor repeat dose studies are required. MOP is apparently used to synthesize a hydroxylated product used in a number of undisclosed applications, although one of them appears to involve the pesticide carbofuran. The test plan states that MOP is used exclusively in the FMC Baltimore plant and it is not transported. On site wastewater treatment removes most of the MOP but some (2 ppm) appears to be released. Workplace exposure studies demonstrated that workplace levels averaged 5 ppm (no ranges were given). Also, trace amounts of MOP were found in Carbofuran and perhaps other products, which means that there is potential human exposure.

Based on this information, we conclude that this chemical does not qualify as a closed system intermediate, and accordingly does not warrant an exemption from repeat dose and reproductive studies. Thus, we urge the sponsor to conduct such studies along with a developmental toxicology study as proposed. No data were presented on 7-OH MOP and it may not be an HPV chemical. However, if repeat dose or reproductive/developmental studies are available on 7-OH MOP, they may be used as a surrogate for MOP and be used to address HPV requirements.

Other comments are as follows:

1. There is an abundance of data from well-conducted studies on the aquatic toxicity of MOP so we agree that no new studies are needed on this endpoint. We also agree with the sponsor's proposal to conduct biodegradation studies.

2. Data from numerous genetic toxicity tests (Ames and L5178Y cells) reveal that MOP is a mutagen and the mutagenicity is caused by MOP itself and not a metabolite. These findings reinforce the need to conduct reproduction/development and repeat dose studies.

Thank you for this opportunity to comment.

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